

**EXHIBIT "D"**

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DECLARATION OF VINCE BLOMFIELD

I Vince Blomfield, say and declare as follows:

1. I first met Josef Boehm in or around 1985<sup>18</sup> and consider him to be a personal friend;
2. I first Bambi Tyree at a gas station in Anchorage, Alaska in or around 2001. I later came to know Bambi Tyree as an experienced "crack" cocaine user. Tyree provided me "crack" cocaine on several occasions and smoked "crack" cocaine with me on several occasions. I was also an experienced "crack" cocaine user and have been clean of my substance abuse problem for a long period of time;
3. Bambi Tyree was a self proclaimed "pimp" and bragged about knowing every local drug dealer. Bambi Tyree obtained most of her drugs from Leslie Williams who was her primary supplier;
4. Bambi Tyree is a well known hustler who's scam was to identify men with money and play the role of a girlfriend who traded sex for drugs. Once the money was gone, so was Bambi Tyree. Bambi Tyree befriended and used several young girls, including Sally Purser for the purpose of promoting her scam. Tyree's scams were furthered through physical intimidation, black mail and threats of calling law enforcement;
5. It was common for Bambi Tyree to get me high on "crack" cocaine and then steal my money when I was asleep and one occasion she absconded with \$25,000.00 from my night stand. Bambi Tyree is one of the best hustlers I have ever seen and systematically scammed me out of approximately \$250,000.00 while keeping me high on "crack" cocaine;
6. Bambi Tyree claimed to be associated with the "Mexican Mafia" as well as a pimp and drug dealer named "Freeze". She has a tattoo

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- 1 which states "Big Daddy" for whom she identifies as "Freeze". It  
2 is my understanding that Tyree testified against "Freeze"  
3 resulting in a criminal drug conviction;
- 4 7. I have personal knowledge of the fact that Bambi Tyree ran the  
5 aforementioned scam on a number of individuals including Josef  
6 Boehm. I was around Mr. Boehm during this period of time and had  
7 conversations with him regarding Tyree's motives and actions;
- 8 8. Bambi Tyree overcame the free will of Mr. Boehm and began to  
9 control his life. She began to make all of the decisions  
10 affecting the day to day activities of Mr. Boehm. This would  
11 include ensuring he remained high from the moment he awoke until  
12 the time he passed out, determining who she would allow to be in  
13 the house and how she would use other young girls to further try  
14 to control Mr. Boehm;
- 15 9. On one occasion I was at Mr. Boehm's residence and witnessed an  
16 argument involving Josef Boehm and Bambi Tyree. Mr. Boehm was  
17 trying desperately to get rid of Tyree who in turn threatened  
18 to black mail Mr. Boehm. In addition to her threats of black  
19 mail, Tyree demanded money from Mr. Boehm in exchange for  
20 leaving.
- 21 10. In or around October, 2003, I stopped by Mr. Boehm's residence.  
22 Bambi Tyree was present with a half a dozen girls. I attempted  
23 to talk to Mr. Boehm, however, Bambi Tyree refused to let me  
24 near him. Regina Moore and Tina Arndt were also present. Bambi  
25 Tyree insulated Mr. Boehm from everyone as it was apparent that  
26 she was afraid to lose control of him. Mr. Boehm appeared to be  
27 incoherent and unaware of his surroundings.
- 28 11. Among the various affects I witnessed on Mr. Boehm was an

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1 obsessive desire for total privacy and security. This desire  
2 manifested itself in ways such as staying primarily in the  
3 upstairs of his home, installing a deadbolt lock on his bedroom  
4 door in the hope of preventing anyone from coming into his  
5 bedroom, installing a sophisticated alarm system which was kept  
6 activated 24 hours a day for the purpose of keeping people out  
7 of his home and certainly not for the purpose of keeping them  
8 trapped inside;

9 12. The desire of unwanted visitors to gain entry into the Boehm  
10 home was manifested, amongst other things, by these people  
11 breaking out a window in the back downstairs bedroom to give  
12 them a consistent means of entering and leaving the Boehm home  
13 at will;

14 13. I witnessed Mr. Boehm's psychosis become dramatically worse  
15 during his relationship with Bambi Tyree. With his degree of  
16 paranoia it was almost impossible for him to deal with a number  
17 of people present that he could not keep track of. On occasion,  
18 he would hold himself up in hotel rooms and disassemble all of  
19 the electronic equipment as a result of his severe paranoia;

20 14. Mr. Boehm often became afraid to stay in his own home. He  
21 started moving from hotel to hotel because the size of the room  
22 and the physical circumstances enabled him to know who was  
23 present and to feel at least a minimally reduced paranoia over  
24 the small surroundings to which he felt he had more control;

25 15. Also present with Bambi Tyree on a regular basis, in addition to  
26 Leslie Williams, was Al Bolling. Mr. Bolling was also a supplier  
27 of "crack" cocaine. I am aware that Bambi Tyree and Al Bolling  
28 have caused young girls to be strung out on heroin in order to

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1 further their own financial needs;

2 16. During my relationship with Bambi Tyree I stayed at Kathleen  
3 Purser's house for a short time. It was there that I met Sally  
4 Purser for the first time. I was sleeping in the bedroom when I  
5 was first approached by Sally Purser who inquired as to whether  
6 I was "Bambi's boyfriend". Sally Purser explained that upon  
7 meeting Bambi Tyree she smoked "crack" cocaine with her.

8 17. Sally Purser also told me about an incident in which she, Bambi  
9 Tyree and a gentleman named Tony Heffner got into a Jacuzzi  
10 together. Sally went on to boast that Bambi Tyree convinced her  
11 to have sex with him. During this conversation, Holly, a friend  
12 of Sally Purser was in the room. It was apparent to me that  
13 Sally Purser was attempting to obtain drugs and money from me in  
14 exchange for sex.

15 18. I have given this declaration of my own free will without any  
16 promise of reward or threat of coercion. I declare under penalty  
17 of perjury under the laws of the State of Alaska that this  
18 declaration is the truth and I will testify consistent with it if  
19 called to do so in a court of law. I have had the opportunity to  
20 read and revise this declaration prior to signing it.

21  
22 Executed this 27 day of December, 2006 at Anchorage, Alaska.

23  
24   
25 Vince Blomfield